

THARRINGTON, SMITH & HARGROVE

ATTORNEYS AT LAW
RALEIGH, NORTH CAROLINA

CARLISLE W. HIGGINS
(1887-1980)

J. HAROLD THARRINGTON
WADE M. SMITH
ROGER W. SMITH
WADE H. HARGROVE
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209 FAYETTEVILLE STREET MALL
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RALEIGH, N. C. 27602

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(919) 821-4711

TELECOPIER
(919) 829-1553

WASHINGTON OFFICE
2000 L STREET, N. W., SUITE 200
WASHINGTON, D. C. 20036

TELEPHONE
(202) 452-9271

October 12, 1993

Mr. William F. Caton
Acting Secretary - STOP CODE 1170
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: Joint Petition For Rule Making

Dear Mr. Caton:

Transmitted herewith on behalf of Capital Cities/ABC, Inc., licensee of Television Station WTVD(TV), Channel 11, Durham, North Carolina; Capitol Broadcasting Company, Inc., licensee of Television Station WRAL(TV), Channel 5, Raleigh, North Carolina; Delta Broadcasting, Inc., licensee of Television Station WKFT(TV), Channel 40, Fayetteville, North Carolina; FSF TV, Inc., licensee of Television Station WRDC(TV), Channel 28, Durham, North Carolina; and Paramount Stations Group of Raleigh Durham Inc., licensee of Television Station WLFL(TV), Channel 22, Raleigh, North Carolina ("Joint Petitioners"), are an original and four (4) copies of a Joint Petition For Rule Making to amend Section 76.51 of the Commission's Rules to include the City of Fayetteville, North Carolina, in the Raleigh-Durham television market.

If any questions should arise during the course of your consideration of the Petition, it is respectfully requested that you communicate with the undersigned.

Very truly yours,

THARRINGTON, SMITH & HARGROVE


Wade H. Hargrove
Counsel to the
Joint Petitioners

WHH/ks
Enclosures

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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION

WASHINGTON, D.C.

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OCT 21 1993

In the Matter of)
)
Amendment of Section 76.51)
of the Commission's Rules to)
include the City of Fayetteville,)
North Carolina, in the "Raleigh-)
Durham" Television Market)

MM Docket No. FCC - MAIL ROOM

To: The Chief, Mass Media Bureau

JOINT PETITION FOR RULE MAKING

Capital Cities/ABC, Inc., licensee of Television Station WTVD(TV), Channel 11, Durham, North Carolina; Capitol Broadcasting Company, Inc., licensee of Television Station WRAL(TV), Channel 5, Raleigh, North Carolina; Delta Broadcasting, Inc., licensee of Television Station WKFT(TV), Channel 40, Fayetteville, North Carolina; FSF TV, Inc., licensee of Television Station WRDC(TV), Channel 28, Durham, North Carolina; and Paramount Stations Group of Raleigh Durham Inc., licensee of Television Station WLFL(TV), Channel 22, Raleigh, North Carolina ("Joint Petitioners") request the Commission to institute a rule making proceeding to amend Section 76.51 of the Rules (47 C.F.R. §76.51) to include the City of Fayetteville, North Carolina, in the "Raleigh-Durham" North Carolina television market designation.

In support thereof, it is respectfully shown as follows:

I.
Introduction

1. Section 76.51 of the Commission's Rules lists the nation's top 100 television markets and one or more core cities within each market. Some markets list more than one designated core city and are referred to as "hyphenated markets." The "Raleigh-Durham" market is an example. The market rankings and city designations specified for each market by Section 76.51 have important regulatory implications. They serve to define the territorial scope of the FCC's program exclusivity rules and the compulsory license for cable systems under federal copyright law.¹ Section 76.51's market listings and city designations were originally established in 1972, but in response to changes in local markets and to assure regulatory parity for competing stations in each market, the Commission, on various occasions, has amended the rule to alter the market rankings and designated cities within each market. In recognition of the fact that the rule's market rankings and city designations are outdated, Congress, in adopting the Cable Television Consumer Protection and Competition Act of 1992 ("Cable Act"), required the Commission to make revisions, as necessary, to update the rankings and the city designations. See, 47 U.S.C. §614.

2. The Commission, in adopting signal carriage rules to implement the Cable Act earlier this year, elected to review each market on a case-by-case basis and noted that petitions requesting market redesignation and which show a "commonality" between a city proposed to be added and the market as a whole will be considered under an expedited rule

¹Specifically, Section 76.51 implicates the Commission's broadcast syndicated exclusivity rule [§73.658(m)], the network non-duplication rule [§76.92], the cable syndicated program exclusivity rule [§76.151], and cable's compulsory license under 17 U.S.C. §111(f).

making procedure. See, Report and Order in MM Docket No. 92-259 (Broadcast Signal Carriage Issues), 8 FCC Rcd 2965, 2977-78, n. 150 (1993).

3. Fayetteville is located within and is a "core" city--economically, socially and culturally--within the Raleigh-Durham ADI. During the twenty-one years since Section 76.51's market rankings and city designations were adopted, the Raleigh-Durham television market has undergone enormous growth and change. Section 76.51, for example, ranks the Raleigh-Durham market number 73; ARB now ranks it number 32. That fact, alone, is reflective of the dramatic and substantial change that has taken place within the market. Much of the change is attributable to the growth of Fayetteville and Cumberland County in which Fayetteville is located. Cumberland County now outranks Durham County, in which the City of Durham is located, in television households, in population and in retail sales. Fayetteville which had a 1991 population of 76,073 has become an integral and essential economic component of the Raleigh-Durham market, and for Section 76.51 to continue to exclude it is to ignore a fundamental economic reality of the market.

4. Of the five petitioning stations, WRAL and WLFL are licensed to Raleigh, WTVD and WRDC are licensed to Durham, and WKFT is licensed to Fayetteville. WTVD is owned by and affiliated with the ABC Network; WRAL is affiliated with the CBS Network; WRDC is affiliated with the NBC Network; WLFL is affiliated with the Fox Network and WKFT is an independent.² Neither WKFT, Fayetteville, nor WLFL, Raleigh, were operating in 1972 when Section 76.51 was adopted. These five stations compete head-

²An additional independent station (WFAY) is licensed to Fayetteville. That station--unlike WKFT, Fayetteville--does not compete on a "market-wide" basis within the Raleigh-Durham ADI.

to-head throughout the market for programming, viewers and advertising revenues. The requested market redesignation would subject each of them to the same regulatory burdens and requirements. It is indisputable that regulatory parity in these circumstances would create a more competitive environment within the market which, in turn, would produce a more vigorous and competitive local television marketplace--a result that would benefit, not only the petitioning stations, but the region's local advertisers and viewers as well. It is for that reason this Petition is filed. See, Affidavit of Mitchell L. Saieed in Exhibit No. 1.

II.
The Addition Of
Fayetteville Is Consistent
With The Commission's Longstanding
Criteria For Market Redesignations

5. The Commission has traditionally considered four factors in evaluating market redesignation petitions: (1) The distance between the existing designated cities and the proposed city; (2) whether the redesignation would extend a station's cable coverage rights beyond its Grade B contour;³ (3) whether the petitioning station or stations have demonstrated a need for the redesignation; and finally, (4) whether the public interest would be served by the redesignation. See Major Television Markets (Fresno-Visalia, California), 57 RR 2d 1122, 1124 (1985). The Commission has noted that these factors tend to indicate whether the addition of a city to a market would more accurately reflect the

³Under the new Cable Act, a commercial station's must carry rights are proscribed by the boundaries of the ADI in which the station is located--not, as was formerly the case, by its coverage contour or its distance from a market's designated cities. Thus, the second factor enumerated above which is cited in the Commission's 1985 ruling in the Fresno case, infra, may not now be applicable or relevant in a market redesignation proceeding.

"areas where stations can and do both actually and logically, compete." See, Notice of Proposed Rule Making, MM Docket 93-233 (Little Rock, Arkansas), Par. 3 (Released August 19, 1993). See also, Cable Television Report and Order, 36 FCC 2d 143, 176 (1972). Applying these criteria, the Commission concluded that a television station in Rome, Georgia, was "unavoidably competitive" with television stations in Atlanta some 60 miles away and added Rome, Georgia, to the Atlanta market. TV 14, Inc., 7 FCC Rcd 8591, 8592, 70 RR 2d 429, 431 (1992). Similarly, the Commission added Clermont, Florida, to the Orlando-Daytona Beach-Melbourne-Cocoa market on a finding that Clermont was ". . . unavoidably competitive with other stations in the market and it would thus be anomalous to treat it as other than a market station." Press Television Corporation, 4 FCC Rcd 8799 (1989), reconsideration, 6 FCC Rcd 6563 (1991). Champaign, Illinois, is located over 80 miles from Springfield, and is listed in Section 76.51 as a designated core city in the Springfield-Decatur-Champaign, Illinois market.

6. Durham and Raleigh are separated by approximately 25 miles. Fayetteville is approximately 59 miles southwest of Raleigh and 72 miles south of Durham. A copy of a map, prepared by the North Carolina Department of Transportation, which depicts the geographical proximity of the three cities is attached as Exhibit No. 2. As noted earlier, Cumberland County in which Fayetteville is located is now the second largest county in the Raleigh-Durham television market and contains 12 percent of the market's television households. The following chart depicts comparative populations, retail sales and television households:

<u>City</u>	<u>1991-1992 Gross City Retail Sales</u>	<u>County</u>	<u>1990 County Population</u>	<u>1991-1992 Gross County Retail Sales</u>	<u>May, 1993 County Nielsen TV Households</u>
Raleigh	\$3,640,000,000	Wake	423,380	\$5,290,000,000	178,340
Fayetteville	\$1,560,000,000	Cumberland	274,566	\$1,980,000,000	92,150
Durham	\$1,550,000,000	Durham	181,835	\$1,740,000,000	74,390

7. These three cities constitute the economic and population anchor points of the Raleigh-Durham television market.

8. As the coverage maps contained in Exhibit No. 3 indicate, the transmitting tower of each of these stations is located within a few miles of the other and each of the stations serves substantially the same geographical area. Three of the four Raleigh-Durham stations place (and the other almost places) a Grade A signal over Fayetteville. WKFT, Fayetteville, places a Grade A signal over both Raleigh and Durham. WLFL, WRDC, WRAL and WTVD are "significantly viewed" (within the meaning of Section 76.5(i) of the Commission's Rules) in Cumberland County in which Fayetteville is located, and WKFT is "significantly viewed" in Wake and Durham counties in which the cities of Raleigh and Durham are located. The four petitioning Raleigh-Durham stations account for an incredible 62 percent of the average quarterly hour audience share in Cumberland County. (Nielsen 1993, Sun. - Sat., 7:00 a.m. - 1:00 a.m.)

9. The cable systems serving Raleigh, Durham and Fayetteville treat the three cities as one market. The cable system serving Fayetteville carries the four petitioning Raleigh-Durham stations, while the cable systems serving Raleigh and Durham carry WKFT, Fayetteville. Newspapers in Raleigh and Durham include WKFT, Fayetteville, in the television

listings for the Raleigh-Durham area, and newspapers in Fayetteville include the Raleigh-Durham television stations in their television listings.

10. WKFT, Fayetteville, has offices in Raleigh, and WRAL, Raleigh, and WTVD, Durham, have offices in Fayetteville. All of the stations' sales staffs regularly and routinely call on advertisers in each of the three cities. WKFT, for example, indicates that as much as 20 percent of its local advertising revenue now comes from Raleigh and Durham.

11. Perhaps the best evidence that there is a "commonality" of interest between the three cities is the fact that these five highly competitive stations--two of which are licensed to Raleigh, one to Fayetteville and two to Durham--could achieve unanimity in their support of this Petition. This, itself, speaks to Fayetteville's economic significance to the market.

12. While the addition of Fayetteville to the market would tend to equalize the geographical scope of the cable compulsory copyright license, the principal benefit of the requested market redesignation to the petitioning stations would be parity under the Commission's syndicated program exclusivity rule. See, Section 73.658(m). Presently, if WKFT, Fayetteville, should acquire the rights (at great expense) to broadcast the highly rated series "Murphy Brown" or "Married With Children" or other programs in syndication, its area of exclusivity against other television stations is limited by Section 73.658(m) to 35 miles from Fayetteville. Thus, WKFT may not acquire exclusivity for its syndicated programs against broadcast of the same programs by local stations WTVD and WRDC which are licensed to Durham nor by WRAL and WLFL which are licensed to Raleigh. These are the very stations with whom WKFT competes day-to-day for viewers and advertising dollars. The same is true, in reverse, for the Raleigh-Durham stations. While the Raleigh and Durham stations may

acquire program exclusivity against each other, they may not acquire it against WKFT, Fayetteville, whose transmitter is but a few miles from theirs, whose coverage and viewing patterns are comparative to theirs and whose sales personnel compete on a day-to-day basis against theirs in Raleigh, Fayetteville and Durham. This regulatory anomaly is destructive of local competition--a result which is harmful not only to the stations, but to local advertisers and viewers as well.

13. In summary, if Fayetteville were added to the market's designated core cities under Section 76.51, all of these highly competitive stations would be afforded regulatory parity, a result which would clearly serve the public interest.

Respectfully submitted,

CAPITAL CITIES/ABC, INC.
CAPITOL BROADCASTING COMPANY, INC.
DELTA BROADCASTING, INC.
FSF TV, INC.
PARAMOUNT STATIONS GROUP OF
RALEIGH DURHAM INC.

By


Wade H. Hargrove

Tharrington, Smith & Hargrove
209 Fayetteville Street Mall
Post Office Box 1151
Raleigh, North Carolina 27602
Telephone: (919) 821-4711

By


Mark J. Prak

Their Attorneys

October 8, 1993

[a:delta/lx - mt disc]

EXHIBIT 1

AFFIDAVIT

I, Mitchell L. Saieed, having been duly sworn do hereby state as follows:

1. I am Vice-President and General Manager of Delta Broadcasting, Inc., licensee of Station WKFT(TV), Fayetteville, North Carolina.

2. I have read the foregoing Joint Petition For Rule Making, and to the best of my knowledge, the factual statements are true and correct.

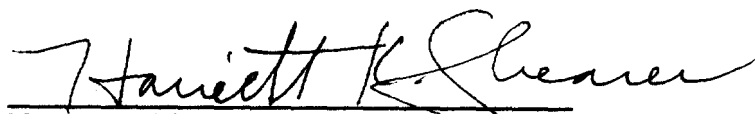
3. Our station competes head-to-head in the Raleigh-Durham ADI with the television stations licensed to Raleigh and Durham for programming, advertisers and viewers. Because of our extensive coverage of the market, we pay market-wide rates for much of our syndicated programming. Unfortunately, because of the Commission's Rules, we are not able to secure exclusivity for that programming against our principal competitors which are the stations licensed to Raleigh and Durham. Our inability to secure exclusivity for our programming on a market-wide basis places us at a competitive disadvantage. To the extent they are unable to secure exclusivity against our programming, the same is true for the stations licensed to Raleigh and Durham.

4. Regulatory parity for the joint petitioners will enhance competition in the market which, in turn, will benefit not only the stations, but the market's advertisers and viewers as well.



Mitchell L. Saieed

Sworn to and subscribed before
me this 8th day of October, 1993.



Notary Public

My Commission Expires:

7/10/97



EXHIBIT 2

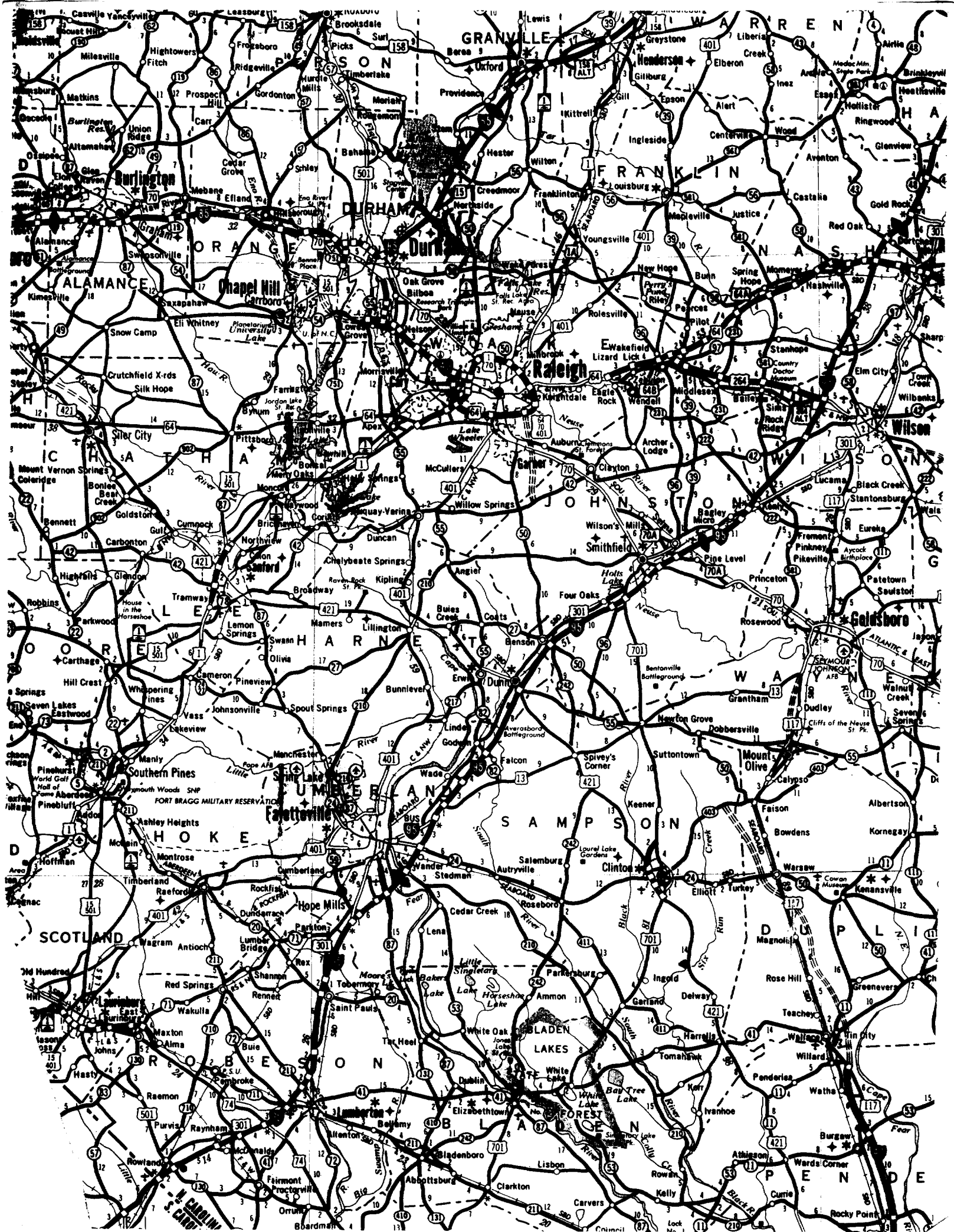


EXHIBIT 3

North Carolina—Fayetteville

WKFT

Ch. 40

Network Service: None, Independent.

Licenses: Delta Bcast. Inc., 131 Wind Chime Court, Raleigh, NC 27615.

Studio: 230 Donaldson St., Fayetteville, NC 28301.

Telephone: 919-323-4040. Fax: 919-323-3924.

Technical Facilities: Channel No. 40 (626-632 MHz). Authorized power: 5000-lw max. visual, 500-lw max. aural. Antenna: 1842-ft. above av. terrain, 1749-ft. above ground, 2149-ft. above sea level.

Latitude 35° 30' 45"
Longitude 78° 58' 40"

Transmitter: 5.9-mi. NE of Broadway, 0.65-mi. E of Hwy. 1538 & 0.6-mi. SW of Cape Fear River.

Multichannel TV Sound: Stereo and separate audio program.

Satellite Earth Stations: Microdyne, 7-meter; ADM, 5-meter; RCA Ku-band; M/A-Corn receivers.

News Service: AP.

Ownership: Delta Broadcasting Inc.

Began Operation: June 1, 1961. FCC approved sale to present owner March 20, 1991. Sale to SLJ of North Carolina Assoc. by Norman J. Suttler, et al., approved by FCC June 20, 1985 (Television Digest, Vol. 25:15).

Represented (sales): Adam Young Inc.

Represented (legal): Tharrington, Smith & Hargrove.

Personnel:

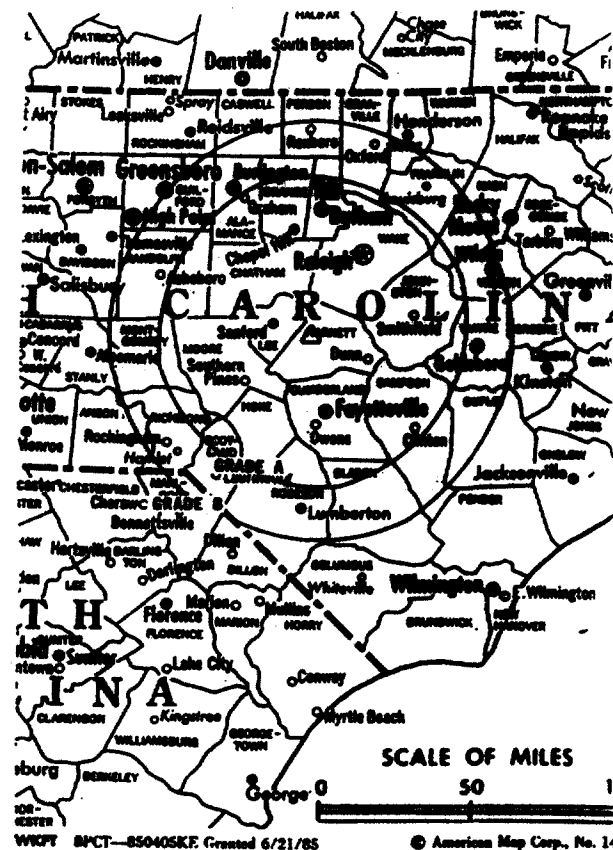
Mitchell L. Saleed, General Manager.
Harry L. Thornton, General Sales Manager.
Arlene Mabry, Program Director.
Eddie Hopkins, Controller.
Jim Lamm, Production Manager.
David Nickels, Chief Engineer.

Rates: On request.

City of License: Fayetteville. ADI: Raleigh-Durham. Rank: 32.

Total Households: ©MSI Consumer Market Data as of 1/1/92. TV Homes, TV's and Circulation ©1992 Arbitron. County coverage based on Arbitron study.

Net Weekly Circulation	State County	Total Households	TV Households	%
Between 25-49%	NORTH CAROLINA			
	Cumberland	90,300	89,500	99
	Durham	73,300	72,600	99
	Harnett	25,500	25,200	99
	Moore	25,000	24,700	99
	Robeson	36,800	36,200	98
	Sampson	18,500	18,200	99
	Scotland	12,300	12,100	98
	Vance	14,500	14,300	99



Net Weekly Circulation	State County	Total Households	TV Households
Between 5-24%	NORTH CAROLINA		
	Alamance	42,900	42,000
	Bladen	11,200	11,000
	Caswell	7,500	7,400
	Chatham	15,400	15,200
	Duplin	15,400	15,200
	Franklin	13,700	13,500
	Granville	13,600	13,400
	Hoke	7,800	7,700
	Johnston	32,100	31,700
	Lee	16,300	16,100
	Montgomery	8,800	8,700
	Orange	36,500	36,000
	Person	11,700	11,600
	Randolph	41,800	41,400
	Richmond	17,500	17,300
	Wake	108,200	108,000
	Wayne	37,400	37,000
	Wilson	25,300	25,000
Station Totals		819,300	818,400
Net Weekly Circulation (1992)			187
Average Daily Circulation (1992)			86

North Carolina—Raleigh

WLFL-TV

Ch. 22

Network Service: Fox.

Licensee: Paramount Stations Group of Raleigh/Durham Inc., 1205 Front St., Raleigh, NC 27603.

Studio: 1205 Front St., Raleigh, NC 27609.

Telephone: 919-821-2200; 919-882-8522. Fax: 919-836-1540.

Technical Facilities: Channel No. 22 (518-624 MHz). Authorized power: 5000-twr max.; Visual, 500-ftw max. aural. Antenna: 1675-ft. above av. terrain, 1545-ft. above ground, 2015-ft. above sea level.

Latitude 35° 42' 51.50"
Longitude 78° 49' 00.50"

Transmitter: 1700-ft. W of intersection of Hwys. 1379 & 1010, 1.5-mi. SE of Apex.

Multichannel TV Sound: Stereo only.

Satellite Earth Stations: 3.5-meter C-band; AFC, 3-meter Ku-band; Gardiner, W/A-Com, Microdyna receivers.

Ownership: Paramount Stations Group (Group Owner).

Begin Operation: December 18, 1981. Sale to S & F Communications was approved by FCC Dec. 21, 1984 but not consummated (Television Digest, Vol. 24:39). Sale to TVA Broadcast Group approved Feb. 10, 1986 (Vol. 25:50; 26:17).

Represented (sales): Sotol Inc.

Represented (legal): Laverthal, Senter & Lattman.

Personnel:

Adam G. Puleock, Vice President & General Manager.

Kathy Busch Young, General Sales Manager.

Steve Williamson, Local Sales Manager.

Kathy Bassett, National Sales Manager.

Ben Ingram, Chief Engineer.

Michael Garle, Director of Programming.

Joe Kack, Director of Promotion.

Deanna Hamilton, Business Manager.

Notes: On request.

City of License: Raleigh. ADI: Raleigh-Durham, Rank: 32.

Total Household: 6451. Census Bureau Market Data as of 1/1/92. TV House, TV's and Circulation of 1992. Actual Daily coverage based on Nielsen study.

Net Weekly Circulation	State	Total Households	TV Households	%
	County			
NORTH CAROLINA				
50% & Over	Chatham	15,400	15,200	99
	Cumberland	90,300	89,500	99
	Durham	73,300	72,600	99
	Garrville	13,600	13,400	99
	Harnett	25,500	25,200	99
	Johnston	32,100	31,700	99
	Lee	16,300	16,100	99
	Orange	36,500	36,000	99
	Person	11,700	11,600	99
	Vance	14,500	14,300	99
	Wake	168,200	166,900	99



Net Weekly Circulation	State	Total Households	TV Households
	County		
NORTH CAROLINA			
Between 25-49%	Alamance	42,900	42,800
	Edgarcombe	21,000	20,800
	Franklin	13,700	13,500
	Greene	5,400	5,300
	Hoke	7,800	7,700
	Moore	25,000	24,700
	Nash	29,100	29,000
	Sampson	18,500	18,200
	Warren	6,200	6,100
	Wayne	37,400	37,000
	Wilson	25,300	25,000
VIRGINIA			
	Modocburg	11,100	10,900
NORTH CAROLINA			
Between 5-24%	Bladen	11,200	11,000
	Carrick	7,500	7,400
	Duplin	15,400	15,200
	Hatter	20,600	20,200
	Montgomery	8,800	8,700
	Northampton	7,600	7,500
	Randolph	41,800	41,400
	Richmond	17,500	17,300
	Robeson	36,800	36,200
	Scotland	12,300	12,100
Station Totals		620,200	616,600
Net Weekly Circulation (1992)			
Average Daily Circulation (1992)			

North Carolina—Durham-Raleigh-Fayetteville

WTVD

Ch. 11

Network Service: ABC.

Licensee: Capital Cities Communications Inc., Box 2009, Durham, NC 27702.

Studio: 411 Liberty St., Durham, NC 27702.

Branch Offices: 225 Green St., Fayetteville, NC 28301; 411 Fayetteville St. Mall, Box 1060, Raleigh, NC 27602.

Mailing Address: Box 2009, Durham, NC 27702.

Telephone: 919-683-1111 (Durham); 919-323-5883 (Fayetteville).

TWX: 510-827-1810. Fax: 919-682-7476.

Technical Facilities: Channel No. 11 (198-204 MHz). Authorized power: 316-kw visual, 47.4-kw aural. Antenna: Circularly polarized, 1990-ft. above av. terrain, 2000-ft. above ground, 2317-ft. above sea level.

Latitude 35° 40' 05"
Longitude 78° 31' 58"

Transmitter: 4-mi. NW of Clayton, 2-mi. SE of Auburn, NC.

Multichannel TV Sound: Stereo only.

Satellite Earth Stations: Andrew C-band; Harris, 9.1-meter C-band; Avantek, Harris receivers.

SMS Mobile Dish: Andrew, 3.7-meter Ku-band.

News Services: AP, UPI.

Ownership: Capital Cities/ABC Inc. (Group Owner).

Began Operation: September 2, 1954. Sale to present owners by principal stockholders Harmon L. & Virginia D. Duncan, J. Floyd Fletcher and WDNC(AM) approved by FCC May 22, 1957 (Television Digest, Vol. 13:14, 21).

Represented (sales): Capital Cities/ABC National Sales Inc.

Represented (legal): Wilmer, Cutler & Pickering.

Represented (engineering): Moffet, Larson & Johnson, P.C.

Personnel:

Timothy Bennett, President & General Manager.

Boris J. O'Connor, General Sales Manager.

Jon L. Miller, Director of Programming.

James Crump, Community Relations Manager.

Carla Meredith, Chief Engineer.

William Higgs, Business Manager.

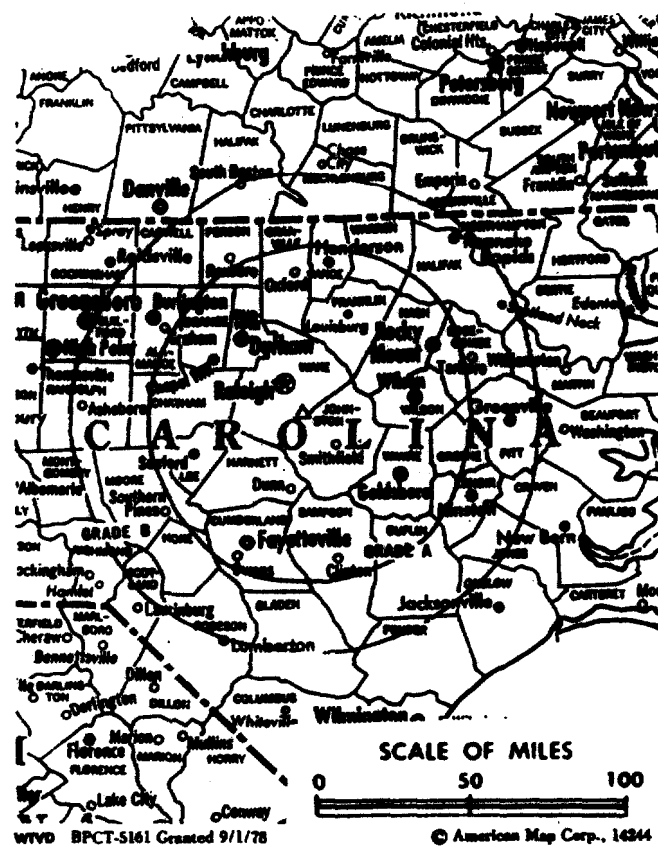
Mark Brown, Sales Service Manager.

Notes: On request.

City of License: Durham. ADI: Raleigh-Durham. Rank: 32.

Total Households: ©MMI Consumer Market Data as of 1/1/82. TV Homes, TV% and Circulation ©1982 Arbitron. County coverage based on Arbitron study.

Net Weekly Circulation	State County	Total Households	TV Households	%
50% & Over	NORTH CAROLINA			
	Chatham	15,400	15,200	99
	Cumberland	90,300	89,500	99
	Durham	73,300	72,600	99
	Edgecombe	21,000	20,800	99
	Franklin	13,700	13,500	99
	Granville	13,800	13,400	99
	Halifax	20,800	20,200	98
	Harnett	25,500	25,200	99
	Hoke	7,800	7,700	99
	Johnston	32,100	31,700	99
	Lee	16,300	16,100	99
	Moore	25,000	24,700	99
	Nash	29,100	28,800	99
	Northampton	7,600	7,500	99
	Orange	36,500	36,000	99
	Person	11,700	11,600	99
	Sampson	18,500	18,200	99
	Scotland	12,300	12,100	98
	Vance	14,500	14,300	99



Net Weekly Circulation	State County	Total Households	TV Households	%
50% & Over	Wake	168,200	168,800	99
	Warren	6,200	6,100	98
	Wayne	37,400	37,000	99
	Wilson	25,300	25,000	99
	VIRGINIA Mecklenburg	11,100	10,900	98
Between 25-49%	NORTH CAROLINA			
	Alamance	42,900	42,800	99
	Duplin	15,400	15,200	99
	Greene	5,400	5,300	98
	Robeson	36,800	36,200	98
	VIRGINIA Halifax	12,900	12,700	98
Between 5-24%	NORTH CAROLINA			
	Bertie	7,500	7,400	99
	Bladen	11,200	11,000	98
	Brunswick	20,900	20,800	99
	Caswell	7,500	7,400	99
	Columbus	19,100	18,800	98
	Lenoir	22,400	22,200	99
	Martin	9,500	9,400	99
	Montgomery	8,800	8,700	99
	New Hanover	48,900	48,500	99
	Onslow	41,100	40,800	99
	Pender	11,100	10,900	98
	Pitt	41,700	41,300	99
	Richmond	17,500	17,300	99
	VIRGINIA Brunswick	5,300	5,200	98
	Charlotte	4,200	4,100	98
	Lunenburg	4,300	4,200	98
	Pittsylvania	41,600	41,200	99
Station Totals		1,169,000	1,155,000	99
Net Weekly Circulation (1982)			888,000	
Average Daily Circulation (1982)			417,300	

North Carolina—Durham-Raleigh

WRDC
(formerly WPTF-TV)
Ch. 28

Network Service: NBC.

Licenses: FSF TV Inc., 3012 Highwoods Blvd., Raleigh, NC 27604.

Studios: 3012 Highwoods Blvd., Raleigh, NC 27604.

Telephone: 919-872-2854. TWX: 510-928-1852. Fax: 919-790-6254.

Technical Facilities: Channel No. 28 (554-560 Mhz). Authorized power: 5000-kw max. visual, 500-kw max. aural. Antenna: 1919-ft. above av. terrain, 1900-ft. above ground, 2215-ft. above sea level.

Latitude 35° 40' 35"
Longitude 78° 32' 09"

Transmitter: 1.6-mi. SE of Auburn.

Multichannel TV Sound: Stereo and separate audio program.

Satellite Earth Stations: Transmit/receive Harris, 6.1-meter Ku-band; Andrew, 4.5-meter C-band; Harris, 3.6-meter Ku-band; RCA, 3-meter Ku-band; Andrew, Harris, M/A-Com receivers.

News Services: AP, NBC.

Ownership: FSF TV Inc.

Began Operation: November 4, 1968. Sale to present owners approved by FCC June 14, 1991 (Television Digest, Vol. 31:15). Sale to Durham Life Bcstg. by Robinson O. Everett, et al., approved by FCC May 19, 1977 (Vol. 17:5).

Represented (sales): Blair Television.

Represented (legal): Wyrick, Robbins & Ponton.

Represented (engineering): Moffet, Larson & Johnson Inc.

Personnel:

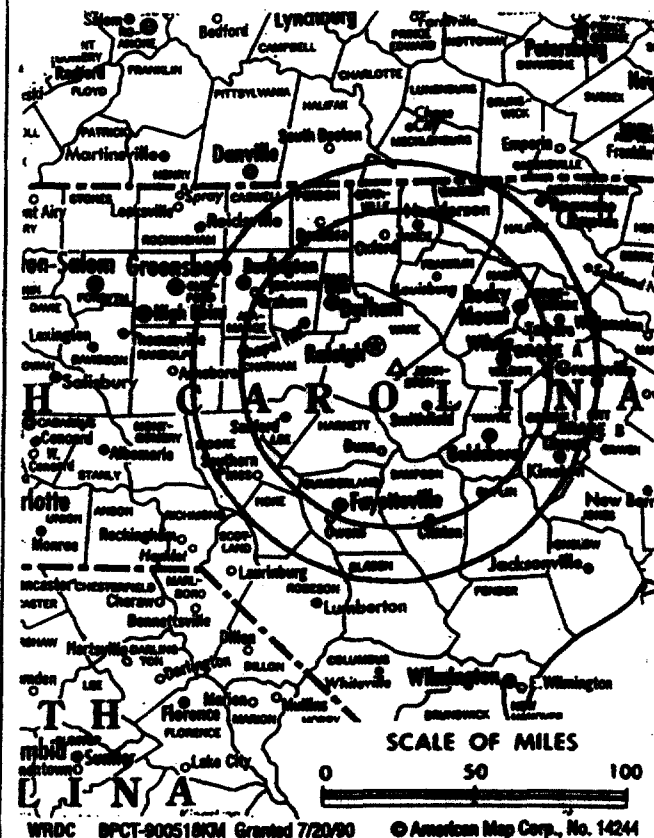
B. W. Landstreet, President.
Victoria Street, Executive Vice President & General Manager.
Greg Briscetta, General Sales Manager.
Mitch Lewis, News Director.
Dave Gerlock, Operations Manager.
Chuck Britt, Chief Engineer.
Jean Harrison, Business Manager.

Rates: On request.

City of License: Durham. ADI: Raleigh-Durham. Rank: 32.

Total Households: ©MSI Consumer Market Data as of 1/1/92. TV Homes, TVX and Circulation ©1992 Arbitron. County coverage based on Arbitron study.

Net Weekly Circulation	State County	Total Households	TV Households	%
50% & Over	NORTH CAROLINA			
	Chatham	15,400	15,200	99
	Cumberland	90,300	89,500	99
	Durham	73,300	72,600	99
	Franklin	13,700	13,500	99
	Granville	13,600	13,400	99
	Harnett	25,500	25,200	99
	Johnston	32,100	31,700	99
	Lee	16,300	16,100	99



Net Weekly Circulation	State County	Total Households	TV Households	%
50% & Over	Moore	25,000	24,700	99
	Orange	36,500	36,000	99
	Person	11,700	11,600	99
	Vance	14,500	14,300	99
	Wake	166,200	166,800	99
	Warren	6,200	6,100	98
Between 25-49%	NORTH CAROLINA			
	Alamance	42,900	42,600	99
	Sampson	18,500	18,200	99
	Scotland	12,300	12,100	98
	Wayne	37,400	37,000	99
	Wilson	25,300	25,000	99
	VIRGINIA			
	Mecklenburg	11,100	10,900	98
Between 5-24%	NORTH CAROLINA			
	Caswell	7,500	7,400	99
	Duplin	15,400	15,200	99
	Edgecombe	21,000	20,800	99
	Greene	5,400	5,300	98
	Halifax	20,800	20,200	98
	Hoke	7,800	7,700	99
	Montgomery	8,800	8,700	99
	Nash	29,100	28,800	99
Station Totals		885,400	796,800	99
Net Weekly Circulation (1992)			436,900	
Average Daily Circulation (1992)			185,200	

North Carolina—Raleigh-Durham

WRAL-TV

Ch. 5

Network Service: CBS.

Licensee: Capitol Bcstg. Co. Inc., Box 12000, Raleigh, NC 27605.

Studio: 2619 Western Blvd., Raleigh, NC 27605.

Mailing Address: Box 12000, Raleigh, NC 27605.

Telephone: 919-821-8555. TWX: 510-928-1833. Fax: 919-821-8554.

Technical Facilities: Channel No. 5 (76-82 MHz). Authorized power: 100-kw visual, 10-kw aural. Antenna: Circularly polarized, 1961-ft. above av. terrain, 1965-ft. above ground, 2280-ft. above sea level.

Latitude 35° 40' 35"
Longitude 78° 32' 09"

Transmitter: 1.6-mi. SE of Auburn.

Multichannel TV Sound: Stereo only.

Satellite Earth Stations: Transmit/Receive Scientific-Atlanta, 10-meter C-band; Scientific-Atlanta, 7-meter C-band; Harris, 6.1-meter Ku-band; Scientific-Atlanta, 4.5-meter C-band; Harris, Scientific-Atlanta receivers.

SMS Mobile Dish: Wolfcoach, RSI, 2.4-meter Ku-band.

FM Affiliate: WRAL-FM, 100-kw, 101.5 MHz (No. 268), 1840-ft.

News Services: AP, CNN, Conus, UPI.

Ownership: Capitol Broadcasting Co. Inc. (Group Owner).

Began Operation: December 15, 1956.

Represented (sales): TeleRep Inc.

Represented (legal): Fletcher, Heald & Hildreth.

Personnel:

Jim Goodman, President & Chief Executive Officer.
Frederick Barber, Vice President & General Manager.
Paul Quinn, Station Manager & Director of Sales.
Laura Stillman, Local Sales Manager.
Doug Minor, National Sales Manager.
Doug Balle, News Director.
Jim Griffin, Program Manager.
Alfred Dunbar Jr., Manager of Engineering.
Clady Sink, Promotion Director.
Leah Chaussey, Business Manager.
Waltie Raselata, Public Affairs Manager.

Notes: On request.

City of License: Raleigh. ADI: Raleigh-Durham. Rank: 32.

Total Households: ©1992 Consumer Market Data as of 1/1/92. TV Homes, TV's and Circulation ©1992 Arbitron. County coverage based on Arbitron study.

Net Weekly Circulation	State County	Total Households	TV Households	%
50% & Over	NORTH CAROLINA			
	Chatham	15,400	15,200	99
	Cumberland	90,300	89,500	99
	Durham	73,300	72,600	99
	Edgecombe	21,000	20,800	99
	Franklin	13,700	13,500	99
	Granville	13,800	13,400	99
	Halifax	20,800	20,200	98
	Harnett	25,500	25,200	99
	Hoke	7,800	7,700	99
	Johnston	32,100	31,700	99
	Lee	16,300	16,100	99
	Moore	25,000	24,700	99
	Nash	29,100	28,800	99
	Northampton	7,600	7,500	99
	Orange	36,500	36,000	99
	Person	11,700	11,600	99
	Robeson	36,800	36,200	98



Net Weekly Circulation	State County	Total Households	TV Households	%
50% & Over	Sampson	18,500	18,200	99
	Scotland	12,300	12,100	98
	Vance	14,500	14,300	99
	Wake	168,200	168,800	99
	Warren	6,200	6,100	98
	Wayne	37,400	37,000	99
	Wilson	25,300	25,000	99
	VIRGINIA			
	Mecklenburg	11,100	10,900	98
	NORTH CAROLINA			
Between 25-49%	Alamance	42,900	42,600	99
	Beaufort	7,500	7,400	99
	Bladen	11,200	11,000	98
	Caswell	7,500	7,400	99
	Duplin	15,400	15,200	99
	Greene	5,400	5,300	98
	Lenoir	22,400	22,200	99
	Pitt	41,700	41,300	99
	Richmond	17,500	17,300	99
	VIRGINIA			
Between 5-24%	Halifax	12,900	12,700	98
	COLORADO			
	San Miguel	1,600	1,500	94
	GEORGIA			
	Marion	1,900	1,800	95
	KANSAS			
	Gove	1,400	1,400	100
	MISSOURI			
	Mercer	1,600	1,600	100
	NORTH CAROLINA			
	Chowan	5,400	5,300	98
(Continued on page A-857)				
Station Totals		1,139,100	1,125,800	99
Net Weekly Circulation (1992)				746,488
Average Daily Circulation (1992)				448,088